REMARKS

Applicants appreciate the Examiner's thorough consideration provided the present application. Claims 1, 4-7 and 10-15 are now present in the application. No claims have been amended in this Reply. Claims 1 and 7 are independent. Reconsideration of this application is respectfully requested.

Claim Rejections Under 35 U.S.C. § 103

Claims 1, 4-7 and 10-15 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Micher, U.S. Patent No. 7,177,797, in view of Onishi, U.S. Patent No. 6,154,720. This rejection is respectfully traversed.

Independent claim 1 recites "an input step for inputting at least a word as a keyword through input means, an extracting step for extracting at least one sentence or sentence fragment including at least the keyword from a database through extracting means, and a text generation step for generating an optimum sentence based on the extracted at least one sentence or sentence fragment by text generation means, wherein parser means morphologically analyzes and parses the extracted at least one sentence or sentence fragment to obtain a dependency structure of the at least one sentence or sentence fragment by determining the probability of dependency of the at least one sentence or sentence fragment by applying a statistical technique using a dependency model, thereby generating a sentence having a maximum probability as the optimum sentence."

Independent claim 7 recites "input means for inputting at least one word as a keyword, extracting means for extracting at least one sentence or sentence fragment including at least the keyword from a database, and text generation means for generating an optimum sentence by

using the extracted text, wherein parser means morphologically analyzes and parses the extracted at least one sentence or sentence fragment to obtain a dependency structure of the at least one sentence or sentence fragment by determining the probability of dependency of the at least one sentence or sentence fragment by applying a statistical technique using a dependency model, thereby generating a sentence having a maximum probability as the optimum sentence."

Applicants respectfully submit that the above combinations of steps and elements as set forth in independent claims 1 and 7 are not disclosed nor suggested by the reference relied on by the Examiner.

The Examiner has acknowledged that Micher fails to teach "an extracting step for extracting at least one sentence or sentence fragment including at least the keyword from a database through extracting means" as recited in claim 1 and "extracting means for extracting at least one sentence or sentence fragment including at least the keyword from a database" as recited in claim 7. In fact, Micher simply teaches a linguistic retrieval system to predict a *word*. More specifically, Micher simply teaching inputting letter(s) (not a word) and the letter(s) are fed into the word prediction software, then designated number of selectable words and word chunks matching the letter(s) is displayed. Therefore, Micher fails to teach extracting at least one sentence or sentence fragment including at least the keyword from a database, and therefore cannot generating an optimum sentence based on the non-existing extracted sentence or sentence fragment.

The Examiner turned to rely on Onishi and alleged that Onishi cures the deficiencies of Micher. Applicants respectfully disagree. In particular, Onishi in col. 19, line 12 - col. 20, line 31 discloses inputting a conversational sentence, extracting semantic feature expressions with

semantic feature names from the conversational sentence, finding out the semantic feature names in the semantic feature strings of two conversational sentence examples registered in the bilingual database 7, and selecting the conversational sentence example *having a larger number of semantic features* (and its English translation) as the displayed sentence. In other words, Onishi selected the displayed sentence *simply based on the number of semantic features in the conversational sentence examples* (see col. 19, lines 25-28 and 46-49), not by *performing morphological analysis and parsing* of the conversational sentence examples registered in the bilingual database 7 *to obtain a dependency structure* of the conversational sentence examples by determining the probability of dependency of the conversational sentence examples by applying *a statistical technique using a dependency model.* In fact, Onishi nowhere teaches a dependency structure of the at least one sentence or sentence fragment nor determines the probability of dependency of the at least one sentence or sentence fragment by applying a statistical technique to generate an optimum sentence.

In addition, although Micher discloses morph function of the displayed word, this teaching simply relates to insertable morphing methodology for noun, adjectives or verbs (see Fig. 4D of Micher). Micher nowhere discloses that the morph function of the displayed *word* is applied to conversational *sentence* examples. Therefore, applying Onishi's teaching to Micher, the output sentence is still determined *only based on the number of semantic features in the conversational sentence examples,* not based on the morphological analysis and parsing of the conversational sentence examples. Accordingly, the combination of Micher and Onishi still fails to teach "parser means morphologically analyzes and parses the extracted at least one sentence or sentence fragment to obtain a dependency structure of the at least one sentence or sentence

fragment by determining the probability of dependency of the at least one sentence or sentence fragment by applying a statistical technique using a dependency model, thereby generating a sentence having a maximum probability as the optimum sentence" as recited in claims 1 and 7.

Accordingly, neither of the references utilized by the Examiner individually or in combination teaches or suggests the limitations of independent claims 1 and 7 or their dependent claims. Therefore, Applicants respectfully submit that claims 1 and 7 and their dependent claims clearly define over the teachings of the references relied on by the Examiner.

Accordingly, reconsideration and withdrawal of the rejection under 35 U.S.C. § 103 are respectfully requested.

CONCLUSION

It is believed that a full and complete response has been made to the Office Action, and that as such, the Examiner is respectfully requested to send the application to Issue.

In the event there are any matters remaining in this application, the Examiner is invited to contact Cheng-Kang (Greg) Hsu, Registration No. 61,007 at (703) 205-8000 in the Washington, D.C. area.

Pursuant to 37 C.F.R. §§ 1.17 and 1.136(a), Applicants respectfully petition for a two (2) month extension of time for filing a response in connection with the present application.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§1.16 or 1.17; particularly, extension of time fees.

Dated: October 14, 2008

Respectfully submitted,

By _____
Paul C. Lewis
Registration No.: 43,368
BIRCH, STEWART, KOLASCH & BIRCH, LLP
8110 Gatehouse Road
Suite 100 East
P.O. Box 747
Falls Church, Virginia 22040-0747
(703) 205-8000
Attorney for Applicant